

Attorney for Linda Mai

UNITED STATES OF AMERICA,  
Plaintiff,

Case No. CR11-00589-RMW

V.

**STIPULATION AND  
[] ORDER CONTINUING  
STATUS CONFERENCE AND  
EXCLUDING TIME FROM  
SEPTEMBER 10, 2012 TO  
OCTOBER ;, 2012**

LINDA CHEN MAI and  
JENNY G. MA,

Defendants.

Plaintiff United States of America, by and through their counsel Assistant United States Attorney, Gary Fry, defendant Linda Mai, by and through her attorney Michelle D. Spencer, and defendant Jenny Ma, by and through her attorney, Jerry Fong, hereby stipulate and agree that, subject to the Court's approval, that the status conference currently scheduled for September 10, 2012 should be continued to October ; , 2012.

1 The parties further stipulate that time should be excluded under the Speedy Trial Act from  
 2 September 10, 2012 through October ; , 2012. The parties are in the midst of resolving the case. The  
 3 government requires additional time to complete the plea agreements. Further, government counsel  
 4 will be on medical leave for two and a half weeks. Accordingly, the parties stipulate to an exclusion  
 5 of time based upon the need for continuity of government counsel.

6  
 7 IT IS SO STIPULATED.

8 MELINDA HAAG  
 9 United States Attorney

10 Date: September 6, 2012

11 /S/  
 12 GARY FRY  
 Assistant United States Attorney

13 Date: September 6, 2012

14 /S/  
 15 JERRY FONG  
 Attorney for Jenny Ma

16 Date: September 6, 2012

17 /S/  
 18 MICHELLE D. SPENCER  
 Attorney for Linda Mai

19 **¶ ORDER**

20 Based upon the foregoing stipulation of the parties, and good cause appearing therefor, the  
 21 Court finds that failing to exclude the time from September 10, 2012 through October ; , 2012 would  
 22 unreasonably deny the government continuity of counsel and the reasonable time necessary for  
 23 effective preparation, taking into account the exercise of due diligence pursuant to 18 U.S.C. §  
 24 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from  
 25 September 10, 2012 through October ; , 2012 from computation under the Speedy Trial Act outweigh  
 26 the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time from September 10, 2012 through and

1 including October ; , 2012 shall be excluded from computation under the Speedy Trial Act, and the  
2 case is calendared for October ; , 2012 at 9:00 a.m. for a status conference.

3  
4 Date: JDFG

  
HON. RONALD M. WHYTE  
Senior United States District Judge